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LAS VEGAS DEIS MEETING.

Inadequacy of the EIS

EIS000709

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(LINCOLN COUNTY)

- 1 The DOE is inconsistent: DOE is certain that its Preferred Action regarding development of the repository is superior to a No Action Alternative. At the same time, the DOE proffers two modes of transportation and, within Nevada, ten total rail and highway routes, to move the waste to the repository, yet does not name its Preferred Action.

To do so, "additional field surveys, state and local government consultations, environmental and engineering analyses, and National Environmental Policy Act reviews" would be required. Why hasn't this already been done? This document cannot be considered competent without this information.

- 2 There are two reasons why the Yucca Mountain repository should not be developed: ground water intrusion and seismic activity. The EIS references the work of "several investigators" who determined the the water table at Yucca Mountain was much higher than it is now, occasionally even reaching the surface. This work was later discredited, but still later, the discreditors were discredited. The DOE says additional research is needed and is ongoing. This proves that the EIS is inadequate; it cannot be considered complete when there is active research into a critical environmental impact.

The information regarding seismic activity is outdated and incomplete. Just since July, there have been two major earthquakes. The EIS says that the repository should be able to withstand a 5.6 magnitude earthquake, yet the seismic potential in the surrounding faults is on the order of 6.5-7.

- 3 When the characterization of Yucca Mountain began, the DOE said it would halt the project if there were any showstoppers. Now, not only has the DOE reneged on that promise, but it is trying to ramrod this half-baked project through. At the very least, the DOE should wait until the research is complete, and preferably until the project is fully-baked.

- 4... Despite the insistence of the DOE that underground storage of nuclear waste is preferable, it seems to me to be common sense that above-ground storage, particularly above-ground storage at the place where the

4 cont. waste is generated, is better.

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I will use the analogy of chemical waste. Thirty years ago, it was acceptable and normal practice to bury nearly any type of chemical waste in the ground. Since various toxic substances got into the groundwater and hurt a lot of people, billions of dollars has been spent cleaning up these dumps and compensating the victims. There has also been a great deal of public scrutiny regarding transportation of hazardous waste, so that the general response is now to destroy it on site. What was the response of the Department of Defense when charged with destroying chemical warfare agents? Build incinerators on site! There are a variety of new and improved technologies to deal with chemical waste, such that public concern about it is substantially lower than it was ten years ago.

5 Instead of sealing nuclear waste inside of a mountain, we should continue to store it where it is generated. The major advantage is accessibility: when we decide that recycling or transmutation of this waste is the right way to deal with it, we can get to it. Secondly, risks associated with transportation are cut to nearly zero. Thirdly, because of the delays in designating a national repository, utilities have already constructed their own dry cask repositories.

6 By the way, [the DOE, in No Action Scenario 1, states that storage at the present sites has the disadvantage of increased risks of sabotage and materials diversion. They do not, however, use that same reasoning when it comes to the 49,500 shipments from across the country to Yucca Mountain. Even without detailed analysis, it is obvious that a shipment of radioactive material, even under military guard, is much more vulnerable to attack than that same material in a secured storage area within a secured nuclear power facility.]

7... -----
The EIS is Incomplete

The imprecise and tentative wording in several sections of the EIS has no place in an analytical document such as this.

Examples are

6.1.2.2 Air Quality

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7 cont. "None of these emissions are expected to exceed..."

6.1.2.3 Hydrology

"DOE does not anticipate impacts..."

"surface water impacts would be unlikely..."

Either it will or it won't. The EIS is supposed to be a definitive document.

8 There is also this curious category called "environmental justice" in the EIS. An important aspect of this was ignored in the transportation options involving Lincoln County and Caliente in particular. Because of the environmental injustice suffered by the people of Lincoln County as a result of atmospheric nuclear bomb testing in the 1950s, Lincoln County should be exempt from any shipments of nuclear waste. It is well-documented that the Federal Government lied about the levels and extent of radioactive fallout and health risks to residents. Subsequently, the Government has admitted fault and liability by remunerating the families of victims who died of certain types of cancers known to be caused by radiation.